

REVLON®



**CODE OF CONDUCT
AND BUSINESS ETHICS**

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A MESSAGE FROM OUR EXECUTIVE CHAIR & CEO, LIZ SMITH

At Revlon, we are committed to upholding the highest standards of business conduct and integrity. Living by Revlon's values – accountability, collaboration, inclusion, and innovation – guide our actions and create long-term value for our employees, consumers, customers, and our broader community.

We all have a responsibility to uphold these values. Revlon's Code of Conduct is one tool that can help each of us do so while also empowering us to make the right business decisions.

I encourage you to familiarize yourself with our Code of Conduct and to "Speak Up" if you have questions or believe you have witnessed an action that may have violated our Code. Speaking Up is critical to maintaining our Company culture.

Acting with ethics and integrity allows us to fulfill our purpose of creating beauty innovations for everyone that inspire confidence and ignite joy every day.

Thank you for your commitment to our Code of Conduct and for all that you do every day, as One Team with One Vision.

Liz Smith

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What is our Code of Conduct and why is it important?

As a multinational company, Revlon is required to comply with numerous laws, rules, and regulations. This Code outlines the principles, standards and expectations that guide our business and our behavior, which is fundamental to our Company's values and success. Revlon People (directors, officers, executives, employees, and others working for Revlon) worldwide are responsible for protecting our Company by acting in strict compliance with the letter and spirit of this Code of Conduct and Business Ethics ("Code") as well as with all applicable laws, and by speaking up with questions or concerns.

At Revlon, we are *One Team with One Vision*. We are all expected to adhere to the highest ethical standards and must:

- Read, understand, and certify compliance with the Code when hired, and annually thereafter
- Comply with all Company policies and procedures, as well as the relevant laws, rules, and regulations everywhere we do business
- Complete relevant and mandatory trainings, including but not limited to, our annual Code of Conduct training

The Code is enforceable to the fullest extent permissible under applicable laws and Revlon Human Resources ("HR") policies. In cases where the law conflicts with provisions in this Code, the best approach is to follow the stricter standard. If you are not sure what to do, contact Revlon Legal or Revlon Compliance for guidance.

We rely on each other to act with integrity and to protect the reputation of our Company.

Other Revlon policies can be found on our intranet at oneinbeauty.com.



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Who does the Code apply to?

This Code applies to all Revlon People and Revlon operations, including all brands, subsidiaries, affiliates, and joint ventures worldwide (collectively, “Revlon” or the “Company”).

Speak up if you do not understand these standards or are concerned that these standards are not being met.



Directors, officers, managers, and supervisors have a heightened responsibility to lead by example. Revlon’s Board of Directors has an additional obligation to report related party transactions, as described in the **Related Party Transaction Policy. Officers, managers and supervisors must provide their teams with the information, guidance and support they need to comply with our Code and encourage them to raise questions or concerns.**

Any exceptions to Company policies or procedures must be approved in advance, in writing, by Revlon’s Chief Compliance Officer and others, as may be appropriate under the circumstances.

Any request for a waiver from any provision of the Code by or on behalf of an executive officer or senior financial officer or member of the Board of Directors of the Company must be reviewed by the Audit Committee of the Board of Directors, or such other Committee as determined by the Board.

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What steps should I follow to make ethical decisions?

Making the right business decision can be challenging sometimes. Following the steps below can empower you to make ethical choices. If you have questions or concerns, please contact Revlon Compliance before doing or not doing something that could violate applicable law, Revlon’s Code of Conduct or otherwise harm the Company.

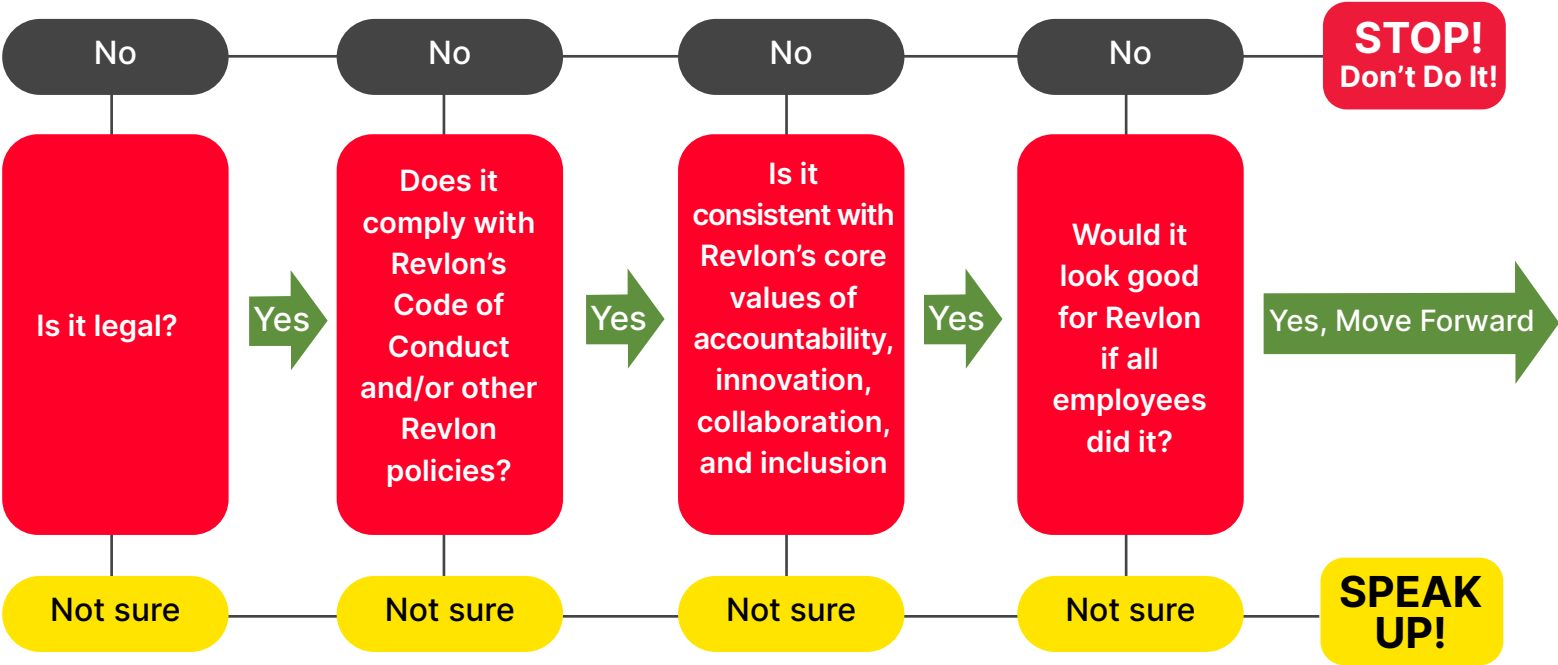


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Where do I go to ask questions or raise concerns?

The Company's brand and reputation relies on Revlon People upholding the highest standards of business ethics and reporting actual or potential violations of law and/or Company policy, even if you don't have all the information.

If you have any questions about any provision in this Code, are unsure about how to proceed in a given situation, or have concerns about conduct that may conflict with or violate any part of the Code or applicable law, you can reach out to any or all of the following:

- Revlon Compliance
- Manager or Supervisor
- Human Resources
- Revlon Legal
- General Counsel
- Chief Financial Officer or Chief Accounting Officer/Controller
- Chief Executive Officer



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Revlon Compliance:

- Call the Compliance Help Line, which is available 24/7 in a variety of languages. You can choose to identify yourself or submit an anonymous complaint.
- Scan the QR Code or click the Web Form link on our Compliance intranet page on oneinbeauty.com to submit a complaint or concern via our Web Form.
- Email the Compliance team at compliance@revlon.com or reach out directly to the Chief Compliance Officer or Deputy Compliance Officer.

Compliance Web Form:



Compliance Help Line Numbers:

United States	844-718-6403
United Kingdom	0808 273 5251
South Africa	+27-872348046
China	400 120 3560
Mexico	800 681 1874
France	0 805 98 55 08
Germany	0800 1815158
Italy	800 974 713
Spain	900 876 206
Japan	0345-104-429
South Korea	00308 491 0127
Singapore	800 492 2547
Taiwan	00801-49-1736
Australia	1800 879 025
New Zealand	0800 369 519
United Arab Emirates	800 0321233

Compliance/Legal Email Addresses:

Alison Hinds-Pearl:

Chief Compliance Officer &
Assistant General Counsel
alison.hinds-pearl@revlon.com

Chelsea P. Azrak:

Vice President, Law &
Deputy Compliance Officer
chelsea.azrak@revlon.com

Revlon Compliance:

compliance@revlon.com

Revlon Legal:

revlon.legal@revlon.com

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What happens after I raise a concern?

All reported actual or potential violations of applicable laws, the Code or other related Company policies will be promptly and thoroughly investigated and will be treated confidentially. All such investigations will be conducted by Revlon Compliance, Revlon Legal, Human Resources, and/or the Company's Internal Audit team ("Company Investigation"). Revlon People should not conduct their own investigations to avoid compromising the integrity of a Company Investigation.

Revlon People should cooperate fully with and provide truthful and accurate information in any Company Investigation. Providing false or misleading information in connection with any such investigation, or refusing to cooperate in any such investigation, is a violation of the Code and may result in disciplinary action, up to and including termination of employment, where appropriate.

Revlon does not tolerate retaliation of any kind against an individual who raises a complaint in good faith and/or participates in a Company Investigation.

A "**good faith**" report means that you have provided all the information you possess, and you believe it to be true.

Retaliation includes discharging, demoting, suspending, threatening, harassing, discriminating, or taking any adverse action affecting the terms and conditions of employment of that individual.

Violations of this Code and any other Company policy are taken very seriously and may result in disciplinary action, up to and including dismissal and/or legal action. In certain cases, a Code violation may also constitute a violation of applicable laws, which could result in civil or criminal action against you, Revlon People and/or the Company.

If you are involved in the actual or potential violation, the Company will consider several factors when determining disciplinary action, including whether you reported the issue, your degree of cooperation in the investigation, and whether the activity at issue was intentional or unintentional, among other factors.

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We are Committed to Revlon People, Social Responsibility, and Sustainability

At Revlon, we strive to positively impact our broader community through promoting a culture of inclusion and diversity, minimizing our impact on the environment, and maintaining transparent, ethical business practices and policies. This commitment inspires our innovation, brings us closer to our consumers, and allows us to contribute to our broader community.

All Revlon People are obligated to operate in an economically, socially and environmentally sustainable manner, including by, where appropriate:

- Helping to increase sustainability by incorporating sustainable elements into our products, including formulas and/or packaging
- Identifying ways to advance diversity and inclusion among employees, consumers, partners and in the community
- Continuing to prioritize the health, safety, and well-being of our employees
- Protecting human rights through responsible supply chain management and ethical manufacturing practices

Revlon People should act professionally and always treat each other with dignity and respect. This expectation applies to behavior in both in-person and virtual work environments and to behavior at work-related events, whether on or off work premises or on or off working hours. Failure to promote a professional, open, and respectful working environment can lead to disciplinary action, up to and including termination.

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We Promote a Respectful and Professional Workplace, and Value Inclusion and Diversity

Our Company strives to maintain and promote a diverse and inclusive environment where all individuals feel valued and respected, have equal access to opportunities and resources, and can contribute fully to Revlon's success. Revlon is committed to attracting and retaining people of all backgrounds, providing equal opportunities for employment, and making employment decisions based on merit. This inclusive culture spreads throughout the broader community by allowing Revlon to serve the needs of our diverse and loyal customer base.

We Do Not Tolerate Bullying, Harassment or Discrimination

Revlon prohibits conduct that constitutes or could lead or contribute to discrimination or harassment based on race, color, creed, religion, sex, gender identity or expression, national origin, citizenship, age, disability, marital/familial status, pregnancy, veteran status, sexual orientation, or any other legally protected classification.

Bullying is the repeated mistreatment of a person on any basis and includes abusive conduct that interferes with or sabotages the work of that person. Both bullying and discrimination can be subtle and may take the form of bias. What we say may not be what we mean, but it can cause unfair treatment and negatively impact our work environment.

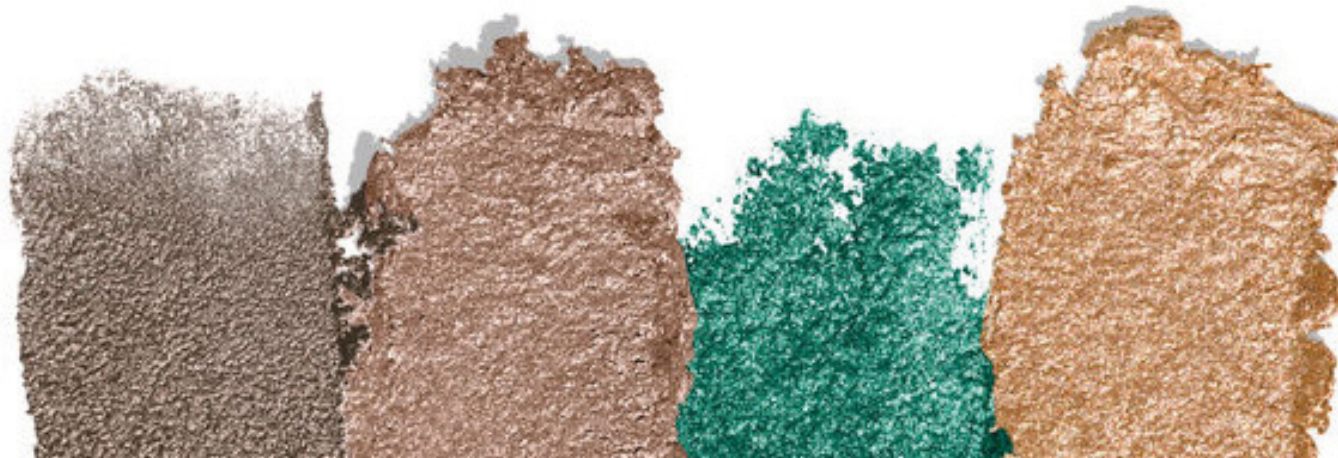


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Bullying, harassment, and discrimination can take many different forms and can occur outside of the office or workplace. Please review the following examples.

Discrimination

- Refusing to give a woman a raise given to all men in the same role
- Using derogatory names, racial, ethnic or religious slurs to another Revlon person whether verbally on the production line or in a coffee shop
- Giving technical projects to a younger or less experienced employee based upon an assumption that an older employee is not adept with computers

Sexual Harassment

- Intimidating someone you manage in order to receive sexual favors in exchange for a raise
- Inappropriate gestures, including winking, sexually suggestive body language and/or words during a virtual meeting or unwanted touching in a bar with colleagues after work
- Unwanted sexual advances and inappropriate touching by a manager to a subordinate at a Company holiday party

Bullying

- Repeatedly ignoring/not allowing a person to speak or express themselves in a meeting
- Repeatedly belittling someone or calling them names like “lazy” or “stupid”
- Taking credit for another person’s ideas/manipulating the ability of someone to do their work by overloading, underloading, or setting unrealistic deadlines

Harassment

- Threatening a woman or person of color that they will lose their job if they raise a concern to management, Revlon Compliance or Revlon Legal
- Using social media or any electronic device (personal or a Revlon device) to harass, alarm, or discriminate against another Revlon person based on sexual orientation, citizenship, marital status, etc.
- Taking a cell phone video of an employee in a meeting and forwarding it to them and others on the team using offensive language to describe the employee’s physical appearance and job performance

Reporting is critical so that the Company may investigate and take appropriate action to stop any inappropriate conduct. For more information, please review our **Anti-Harassment/Anti-Discrimination Policy**.

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We Prioritize the Safety and Health of our Employees

At Revlon, we are committed to eliminating hazards from the workplace, providing Revlon People with a safe and healthy work environment, and complying with all applicable occupational safety and health laws. Revlon People should report any adverse health or safety incidents or conditions, including broken equipment or machinery and accidents, to the person responsible for safety at each facility or to Revlon Compliance.

Revlon does not tolerate violence, or threats of violence, in the workplace. Firearms and other weapons are not permitted on Company property, even if you have a license or permit to carry a weapon, unless Revlon’s Chief Compliance Officer and Head of Global Security have provided advance, express written permission.

Any violation of this provision should be reported immediately to Revlon Compliance and the Head of Global Security. In the event of an emergency, you should dial 911 or the applicable emergency services number. To promote productivity, protect the safety of others, and comply with the law, Revlon prohibits the use of illegal drugs or narcotics in our workplace. In addition, you may not perform your job if you are impaired by and/or under the influence of any illegal drugs, alcohol, marijuana, other controlled substances, or misused prescription drugs.

We Are Committed to Universal Human Rights and Fair Labor

Revlon is committed to respecting and promoting human rights, including providing fair and equitable wages to employees globally and recognizing employees’ rights to freedom of association and collective bargaining. Revlon prohibits the use of child labor, forced labor, modern slavery, human trafficking and all other forms of human exploitation and unacceptable treatment of workers. Revlon expects that all Revlon People, as well as Revlon’s suppliers and contractors, uphold the same standards. Revlon conducts business with organizations that respect human rights and are fair to their employees, as detailed in Revlon’s **Third Party Code of Conduct**.



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We Comply with Environmental Laws and Regulations

Revlon is committed to evaluating all potential environmental impacts in corporate decision-making with a view to enhance conservation of energy and natural resources, avoid the release of any pollutant that may cause environmental damage, minimize the creation of waste, dispose of waste through safe and responsible methods, minimize environmental risks by employing safe technologies and operating procedures, and increase preparedness for emergencies, in compliance with all applicable environment laws.

Revlon People are prohibited from engaging in the following behavior:

- Bypassing any environmental control or monitoring device(s)
- Entering false information on any governmental environmental form, on any monitoring report or in response to any request for environmental information from any governmental agency
- Tampering with or diluting samples, or otherwise providing false information about the results of sampling, testing or analysis
- Intentionally failing to follow permit conditions or applicable protocols for collecting, sampling, testing, analyzing, or recording of environmental data



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We Have Zero Tolerance for Bribery, Corruption and Money Laundering

As a global company, Revlon must comply with international anti-corruption and anti-bribery laws. Revlon People are prohibited from offering, promising, giving and/or receiving anything of value directly or indirectly to or from a third party, including government officials, to obtain an improper business advantage.

“Anything of value” includes:

- Cash, cash equivalents, including gift cards
- Lavish gifts, travel, entertainment, meals
- Even lower value gifts, not reasonably related to a legitimate business purpose
- Employment opportunities
- Charitable and/or political contributions
- Overpayments and/or discounts, including sham contracts
- Use of personal or company property, such as vacation homes

An **“improper business advantage”** can include inappropriately attempting to influence a business decision in favor of Revlon, to obtain or retain business, obtain a business permit or license, or influence the outcome of a government audit/inspection/decision.

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Improper Offers and Payments are Prohibited. It is not necessary that a gift or payment actually be given; the promise or offer alone is prohibited. This applies regardless of the country in which the payment is offered or made, and regardless of whether the recipient is a government official or private citizen. This prohibition also includes payments to expedite or facilitate routine government actions, such as expediting an import through customs, commonly referred to as facilitation payments.

Gifts to Government Officials Require Pre-Approval. No items of value should be offered or provided to a government official without written pre-approval from Revlon Compliance. The definition of a “government official” is broad and can include individuals who are employed by any public entity or institution or who perform any official acts on behalf of a government, regardless of status or seniority.

Closely Manage Third Parties. The prohibition on improper gifts and payments applies equally to actions taken by a third party working on our behalf. Before engaging a third party who will interact with government officials on our behalf, please work with Revlon Legal to ensure that contracts are in place and that due diligence has been completed, as appropriate.

Money Laundering is Prohibited. In addition to bribery, facilitating or engaging in money laundering and/or terrorist financing violates this Code and international laws. Money laundering is an attempt by individuals or entities to make the proceeds of illegal earnings appear legitimate or “clean.”

Revlon People should notify Revlon Compliance or Revlon Legal of any suspicious transactions or “red flags,” such as:

- Third party payments structured in an unusual way or coming from or directed to a strange account
- Overpayments
- Large payments in cash
- Payments made in unexpected currencies

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We Do Not Give or Accept Inappropriate Gifts or Entertainment

Employees are prohibited from giving or receiving excessive or uncustomary gifts or services to or from third parties. Gifts require pre-approval. As described above, any gifts to government officials or government employees require written pre-approval from Revlon Compliance regardless of the value.

Gifts valued below \$100 USD require written pre-approval from your General Manager.

Gifts valued above \$100 USD require written pre-approval from Revlon Compliance.

Pre-approval is based on:

- The dollar threshold, which is the actual cost or fair market value of the item. For example, if a third party offers you a free ticket to accompany them to a sporting event and tickets to the event originally sold for \$150 USD, the employee must obtain written pre-approval from Revlon Compliance, even if the third party states that there is no cost to the third party or the employee.
- Other factors, including the business reason for attending the event, any pending or recently signed deals with the third party, and the frequency with which you have attended other events with the same third party within the preceding twelve (12) months.

No Cash or Cash Equivalent Gifts are Permitted

Under no circumstances should Revlon People give or receive cash or cash equivalent gifts, including gift cards, to or from third parties, including vendors, suppliers, customers, distributors or anyone selling products on Revlon's behalf. Internal Company raffles or contests, where a gift card or other items of value may be awarded by Revlon as a prize to Revlon employees, must comply with applicable Human Resources policies and local marketing and tax laws.



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Here are **Do's and Don'ts** to help you understand the guidance about gifts to and from **third parties** at-a-glance:

Gifting Do's

Consider the following before giving/receiving a gift:

- Is there a legitimate business reason to give or receive a business gift?
- Are you currently negotiating a deal with the third party?
- Is it lavish?
- Is it appropriate under the circumstances?
- When was the last time you gave a gift to or received a gift from this third party?

Get pre-authorization in writing from the General Manager of your business before providing a gift to or receiving a gift from a customer, vendor or other business contact with a value of **less than \$100 USD**.

Get pre-authorization in writing from Revlon Compliance before providing a gift to or receiving a gift from a customer, vendor, or other business contact with a value of **more than \$100 USD**.

Get pre-authorization in writing from Revlon Compliance before providing a gift to a **government employee or official**, including employees of government-owned entities or businesses, **regardless of the value**.

Document your gifts to/from third parties, including the purpose, type, recipient information, dollar value, date, and approval documentation.

Gifting Don't's

Give/receive gifts that could create the risk of bribery or an actual/potential conflict of interest.

Examples include giving/receiving:

- Anything of value when negotiating a business deal or as a "thank you" for signing the deal.
- Excessive or uncustomary gifts or any other benefit (e.g., sporting event tickets, use of vacation property).

Accept a gift from or give a gift to a potential/existing vendor/third party with a value of over \$100 USD or accept/give multiple gifts from/to the same individual or entity with a total annual value exceeding \$100 USD, unless you receive written pre-approval from Revlon Compliance.

Give or accept cash or cash equivalent gifts, including **gift cards**.

Offer or accept any benefits (e.g., employment, discounts, overpayments, travel, meals, entertainment, etc.) to obtain an improper business advantage (whether directly or through a third party).

Make/accept charitable or political contributions to improperly influence a business decision in favor of Revlon.

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We Make *Bona Fide* Donations and Contributions, and Comply with Lobbying Laws

Monetary or in-kind charitable contributions, political contributions and lobbying are legitimate business activities that can also create compliance risk. To manage these risks, please follow the guidance below.

Charitable Donations. Like many companies, Revlon makes monetary or in-kind charitable donations, as a good corporate citizen. Revlon does not make charitable contributions in exchange for products, services, favors, or to generate or retain business.

To protect Revlon, Revlon People must complete a pre-approval process for corporate charitable donations, which includes completion of a background check on the recipient organization as well as pre-approval from Revlon Compliance and the CEO's Chief of Staff. Cause marketing or co-venture agreements where a charitable organization will receive a corporate donation from Revlon tied to product sales or consumer action must be vetted by Revlon Legal to comply with applicable marketing laws and by Revlon Compliance to perform background checks on the recipient organization.

As a general rule, Revlon does not make charitable contributions to the following:

- Individuals (including funding campaigns such as GoFundMe, etc.)
- Religious organizations
- Political causes, organizations, campaigns, or events
- Labor organizations
- Non-charitable organizations
- Organizations or programs that:
 - Discriminate based on age, gender, race, national origin, religion, sexual orientation, gender identity, veteran status, marital status, disability, or any other protected category under federal, state, or local law
 - Fund terrorist groups or activities
 - Otherwise pose an actual or potential conflict (e.g., employee personal charities) with and/or present reputational risk to Revlon

Revlon cannot support personal charitable activities and employees cannot use their position with our Company to solicit charitable donations or create an appearance that Revlon endorses or supports personal charitable activities.

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Political Contributions. Revlon prohibits the use of Company funds, assets, services or facilities for a political party or candidate, except under certain limited circumstances. Employees may voluntarily make personal political contributions, participate in the political process on their own time and at their own expense, express their personal views on legislative or political matters, or engage in any other lawful political activities, if those activities are not performed on behalf of or attributable to Revlon.

Revlon People are also prohibited from compensating or reimbursing any employee or third party for any political contribution. Revlon People may not solicit other employees or third parties who provide services for Revlon to make contributions to a political party, candidate, or political action committee without pre-approval from Revlon Compliance or Revlon Legal. If approved, such solicitation must communicate that all contributions are voluntary, that no one will be adversely affected as a result of their decision not to contribute, and that political contributions are not tax deductible.

Lobbying. Revlon sometimes engages in direct advocacy with lawmakers and other government officials, and sometimes engages third parties to advocate on our behalf. Revlon People are prohibited from contacting government officials or engaging others to do so on Revlon's behalf unless expressly authorized by Revlon Compliance or Revlon Legal.



We Do Not Engage in Anti-Competitive Behavior

Revlon takes pride in competing fairly and legitimately in the markets in which we operate. As such, all Revlon People must comply with competition laws and regulations (known as "antitrust" laws in the U.S. and similar laws in other countries), which are designed to promote free and open competition, as described further below. Business practices that may implicate competition laws include:

Pricing Considerations. We should always make independent pricing decisions for each of our products based on factors such as value to the customer, cost, and competitive pressure in the marketplace. We must not exchange confidential information, such as product prices, fees charged, promotional allowances, promotional plans, other marketing fund allowances, profit margins or credit and billing practices, with competitors.

In addition, in the U.S., all promotional allowances and services, free goods, display fixtures, volume discounts, advertising, merchandising assistance and demonstrators must be offered on functionally equivalent, proportionately equal terms, to all customers who compete in selling the Company's product in the same channels and markets.

Resale Price Maintenance. We can recommend resale prices to customers, but cannot set or enforce minimum resale prices, or otherwise interfere with a customer's right to establish its own resale prices.

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Tying. Tying may occur when a buyer is required, as a condition of purchasing one product, to also purchase a second, distinct product. Tying arrangements should never be implemented without first consulting Revlon Legal.

Confidential Information. We may not exchange any confidential information with a competitor. Confidential information includes any information that is non-public, including but not limited to planned product launches, new product development, costs, and pricing.

Industry Events. Any agreement, whether formal or informal, or any joint activity involving the Company and any competitor, where the intent or effect is to reduce competition, is against antitrust and competition laws and regulations. If you attend trade association meetings and other industry gatherings, you should avoid discussing price, discounts or promotions, or any other information that could result in restricting competition in the marketplace. If any of these topics are raised during the association/industry meeting, do not participate in the discussion, tell the participants that you are leaving the meeting because such topics were raised and immediately contact Revlon Legal or Revlon Compliance.

We Comply with U.S. and Other Applicable Trade Regulations and Sanctions Regimes

As a multinational company, Revlon and all Revlon People must comply with U.S. trade regulations, regardless of the country in which you are operating. U.S. trade regulations also require that Revlon and our third party partners comply with specific sanctions, available online at: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>. If you are operating in a country outside of the U.S., you must also comply with the trade regulations and sanctions regimes in the U.S. and the local laws in that country.



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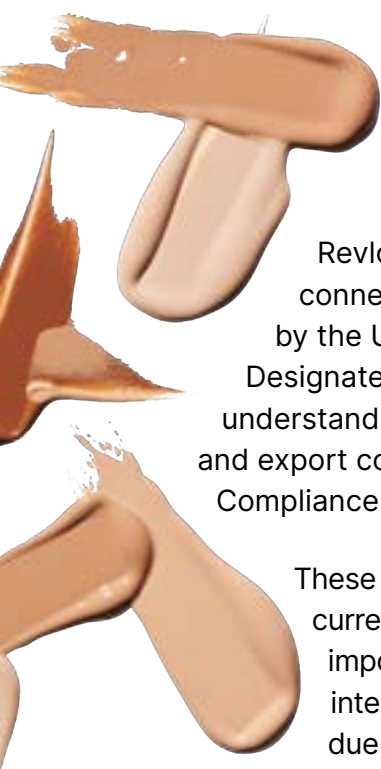
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U.S. sanctions prohibit U.S. companies from conducting any business activity such as the manufacture, distribution, or sale of products in certain countries/territories, including but not limited to, directly or indirectly, with or to North Korea, Syria, Cuba, Iran, and Russian occupied territories in Ukraine (e.g., the Crimea Region, Donetsk and Luhansk). Other areas of significant sanctions risk and export controls may include but are not limited to Afghanistan, Belarus, China, Myanmar, Russia, Venezuela, West Bank and Gaza, and Yemen.



As a result, advance written authorization from Revlon Compliance is required to confirm that any business activity on behalf of Revlon in areas of sanctions risk and/or export controls (including but not limited to the illustrative list above) would comply with U.S. trade laws before engaging in any such activity on Revlon's behalf.

Revlon People are also prohibited from conducting any business on Revlon's behalf or in connection with Revlon's business with any person or entity that is subject to sanctions by the U.S. Government or other local governments where we operate, including "Specially Designated Nationals" and other "Denied Persons." In order to satisfy this obligation and with the understanding that U.S. embargoed countries and territories and areas of significant sanctions risk and export controls may change from time to time, you are responsible for following Revlon Legal/Compliance and Procurement processes to help the Company manage this risk.

These prohibitions and restrictions are subject to change and may affect exports, imports, travel, currency transactions, and assets and accounts. The civil and criminal penalties that may be imposed for violations are severe. Accordingly, Revlon People who have responsibility for international business activities must follow Company risk management procedures, including due diligence processes to appropriately screen third parties against government sanctions lists and should consult frequently with Revlon Compliance or Revlon Legal with any questions.

For more information about government sanctions and related laws, such as anti-boycott laws, please visit the Compliance page on [oneinbeauty.com](https://www.oneinbeauty.com). If you have questions about whether certain activities are prohibited, please contact Revlon Compliance, and do not engage in such activity until you have received approval from Revlon Compliance.

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We Work with Reputable Business Partners

Revlon works with reputable third-party partners who meet our high standards of business ethics and embrace our professional values, which are codified in Revlon's **Third Party Code of Conduct** ("Third Party Code").

Revlon People must follow Company risk management procedures, including due diligence processes, such as background checks on third parties, and follow internal approval procedures before signing an agreement with a third party to perform services for Revlon.

The Third Party Code requires that all Revlon third party partners comply with all applicable laws including anti-bribery and anti-corruption, anti-money laundering, anti-terrorism, antitrust and competition, data privacy and protection, cybersecurity, environmental and health and safety, labor and employment, product manufacturing, product quality and safety, international trade regulations, sanctions, import/export and product registration. The Third Party Code also prohibits third party partners from using forced labor and child labor, engaging in modern slavery, human trafficking and exploitation or any other unacceptable treatment of workers.

It is your responsibility when engaging with a third-party supplier, vendor, or business partner to confirm that the third party understands and agrees to comply with Revlon's Third Party Code. A third party should not be permitted to perform services for Revlon until the steps described above have been completed.

Revlon People and all third party partners are required to report actual or suspected violations of Revlon's Third Party Code or applicable law to Revlon Compliance.

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We Avoid and Report Conflicts of Interest

Acting ethically means using good business judgment to act in Revlon's best interest. A "conflict of interest" may cloud your business judgment or impact your ability to make objective and effective business decisions in Revlon's best interest. Some areas where conflicts of interest may arise are discussed further below, and Frequently Asked Questions regarding conflicts of interest are available on oneinbeauty.com.

Personal Investments. Unless you obtain approval from Revlon Compliance, you are prohibited from having either a direct or indirect ownership or other interest in any competitor, supplier of goods or services, or customer of Revlon.

Close Personal Relationships. A conflict of interest can arise from close personal relationships between employees, employees and temporary workers, employees and business partners (including independent contractors or suppliers), or employees and competitors. Close personal relationships can arise from, among other things, familial connections, romantic relationships, external preexisting business relationships or networks, or individuals living in your household. You must disclose any such relationships to your manager, Human Resources, or Revlon Compliance.

Workplace relationships between employees could negatively impact job performance, impede the ability to supervise others, disrupt the work environment, create the impression of favoritism, or make other employees feel uncomfortable. As mentioned above, romantic relationships in the workplace should be disclosed to Revlon Compliance and at no time may any manager supervise an employee with whom they have a romantic relationship.



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Outside Employment and Other Activities. Unless you obtain written pre-approval from Revlon Compliance, you may not serve as a paid or unpaid consultant to, or as a director, officer, board member, employee, partner, agent, or representative of, any organization, especially an organization that is an actual or potential competitor, supplier of goods or services or customer of Revlon. Such relationships can create the appearance of divided loyalty and collaborating with a competitor, supplier or customer creates the risk that the employee may inadvertently disclose proprietary information to such organization or allow such organization to benefit from the employee's association with the Company.

If you are approved to engage in outside employment or activities:

- It should not be so demanding on your time or attention that it interferes with your job performance or performance of services. You cannot use Revlon property and/or products (whether purchased or provided at no cost) in connection with your outside employment or business activities or use your position at Revlon to benefit your outside employment or business activity in any other way.
- If you receive public attention (e.g., media coverage, public recognition) for work performed in connection with outside employment or outside volunteer activity, notify your supervisor or Revlon Compliance.

If you believe you have an actual or potential conflict of interest **at any time during the course of your employment with or service to Revlon**, you are required to promptly disclose it by completing a **Conflicts of Interest Questionnaire**, which is available on the Compliance page on **oneinbeauty.com**. Revlon Compliance will review each disclosure and determine next steps. Please do not take any action regarding your request until you have received a determination from Revlon Compliance.

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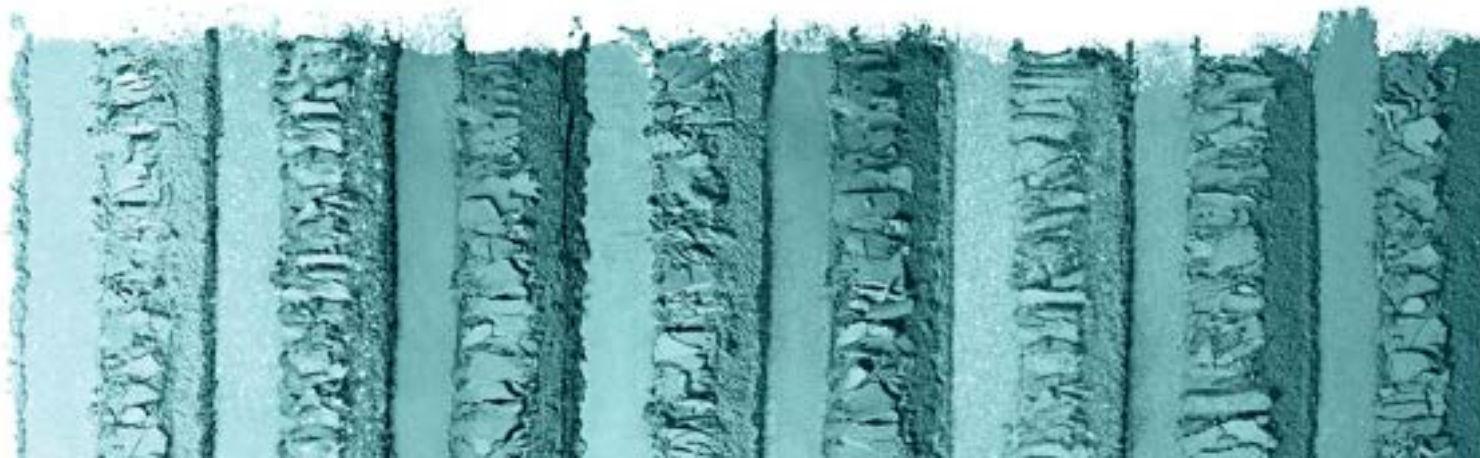




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WE ACT WITH FINANCIAL INTEGRITY

We Comply with U.S. Securities and Insider Trading Laws

All Revlon People worldwide must comply with U.S. securities laws, which prohibit trading securities using material non-public information, commonly referred to as insider trading.

In the course of your employment with or service to Revlon, you may become aware of material non-public information regarding the Company or other firms it does business with. You cannot buy, sell, or otherwise trade securities when in possession of material non-public information or disclose such information to another person.

Examples of “material” information include, but are not limited to:

- Financial results or forecasts
- Dividends
- Possible mergers, acquisitions, joint ventures
- Obtaining or losing important contracts
- Important product developments
- Major litigation developments
- Major changes in business strategy

Information is only considered “public” when official announcements of information have been adequately disclosed so that the public has had the time and opportunity to evaluate the information.

Examples of adequate disclosure include public filings with securities regulatory authorities (such as Annual Reports on Form 10-K, Quarterly Reports on Form 10-Q and Current Reports on Form 8-K filed with or furnished to the SEC), issuance of Company press releases and may also include Company meetings with members of the press and the public.

If you have a question about confidential information and/or securities trading, please refer to the Company’s **Confidentiality of Information and Securities Trading Policy** and/or contact Revlon Legal before taking any action.

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We Maintain Accurate Books and Records and Appropriately Retain Company Records

Accurate and timely recording and reporting of information is critical to our ability to make responsible business decisions. Our financial statements, including the books and records on which they are based, and all operating records must fully, fairly and accurately reflect all corporate transactions. These records must conform to all legal and accounting requirements, and internal accounting policies, procedures, and controls for all Company operations, including financial reporting.

Revlon People should not:

- Knowingly provide false, misleading, or inaccurate Company information
- Fraudulently or improperly influence, coerce, manipulate, or mislead any independent public or certified accountant engaged in the performance of an audit of the Company's financial statements for the purpose of rendering such financial statements materially misleading
- Take any action that could be reasonably expected, if successful, to result in rendering such financial statements materially misleading

Likewise, we must comply with all laws relating to records preservation which require that certain documents and communications be retained for varying periods. For more information, please see our [Global Records Retention Policy](#).

If you become aware that there is potential or pending litigation, government investigation or subpoena, you must immediately contact Revlon Legal and retain any related documents and communications. If Revlon Legal has issued a Hold Order, you should retain all related materials until the Hold Order has been lifted by Revlon Legal. If you have any doubt as to whether any materials should be retained, you should consult with Revlon Legal and retain the materials unless advised otherwise.

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We Protect Company Confidential and Proprietary Information

Revlon People may have access to the Company's confidential and proprietary information, including intellectual property (defined below), which is commercially sensitive and valuable. Revlon People may not improperly disclose or use any confidential or proprietary information learned as a result of their relationship with the Company to benefit themselves or others, even after their relationship with Revlon ends. Similarly, Revlon People are also prohibited from improperly using commercially sensitive, confidential, or proprietary information obtained from former employers or other third parties.

We Protect Company Intellectual Property

Various laws govern the use of material and/or information which may be the subject of a trademark, patent, or copyright or which may be treated as a trade secret. The Company owns (and/or uses under a license) numerous trademarks, patents, copyrights, and trade secrets ("intellectual property") that are vital to its success. To protect the Company's rights, employee use of all intellectual property owned by the Company and by third parties must be in accordance with all applicable laws and our policies, including the **Global Trademark, Copyright, and Domain Name Policy**. In addition, Revlon People are prohibited from infringing on the legal rights of third parties with respect to intellectual property owned by them.

Contact Revlon Legal if you have questions about any of the following:

- Trademark, copyright, or right-of-publicity laws
- The Global Trademark, Copyright, and Domain Name Policy
- Trade secrets or patent laws, including the patentability of a formula, packaging, product, or idea
- An unsolicited submission from a third party, including a proposal for new products, packaging, marketing ideas or business ideas (see also our **Unsolicited Submissions Policy**)

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We Protect Company Assets and Use Information Technology (IT) Resources Appropriately



Revlon People are responsible for protecting the Company's assets, including Revlon's IT network (including but not limited to e-mail, instant messaging, and the internet) and any Company equipment and devices. Revlon People should use such assets and resources only for appropriate business purposes and in a professional, ethical, respectful and lawful manner, as described in the Company's IT policies. Employees must also report theft or misuse of Company property or resources to Revlon Security at security@revlon.com.

Infrequent use of Revlon's IT network and Company devices for personal reasons is acceptable, provided it does not interfere with business activities, it complies with all IT Security protocols/best practices and is not used for activities that are unlawful, unprofessional, unethical, disrespectful or is otherwise contrary to this Code or other Company policies.

Revlon People do not have any right of privacy when using Revlon's IT resources, including Revlon's IT network and Company devices.

Revlon owns the Revlon IT network and all information that is stored or processed on that network including, but not limited to, documents, electronic messages, spreadsheets, ideas, inventions, processes, designs, concepts, formulas, algorithms, data, programs, applications, documentation, studies, tests, literary work, audiovisual work and any other work of authorship or other information created, sent, received, deleted, stored, or otherwise associated in any way with the Company's business.

Revlon may access, monitor, review, intercept, quarantine, copy, delete, or disclose any information stored on or transmitted through the network, including but not limited to software, electronically stored documents, e-mail, telephone messages, instant messages, text or SMS messages, other electronic messages, internet access, and communications and information captured, stored, or synced to any cloud using Revlon-issued mobile devices, subject to local laws and regulations. Revlon People may be required to provide their Revlon-issued mobile devices or any personal device that may be determined to contain Company information in connection with any Revlon Legal or investigative matter, subject to applicable laws.

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Please contact IT and/or IT Security with any questions about this section of the Code and/or IT policies.

We Comply with Data Privacy and Protection Laws

Revlon respects the privacy rights of its employees and those with whom we conduct business, such as our consumers and customers. We monitor evolving data privacy and protection laws and handle personal data responsibly and in compliance with these laws. In general, personal data, also referred to as personally identifiable information (“PII”), refers to information that identifies or relates to an individual person, such as name, email address, physical address, telephone number, date of birth, health information and payment information.

As part of your employment, you may provide certain personal data to the Company, such as email and physical address and family information, which you agree that the Company may use for the administration of the employment relationship, including for benefits. Similarly, consumers, customers, suppliers and other third parties – in the course of their business relationships with Revlon – may provide personal data, such as names, telephone numbers, physical addresses, e-mail addresses and credit card information, to the Company.

If you are authorized to access personal data in the performance of your job, you may only access, collect, use, or share such data to the extent necessary and relevant to fulfill your assigned job responsibilities and in accordance with Revlon policies and applicable laws and regulations. Consumer data uses are governed by the Company’s privacy notices on our consumer-facing websites.

Revlon People are expected to comply with the following data privacy principles:

- Provide adequate notice prior to collecting personal data
- Obtain consents to use personal data, where required by applicable law
- Only collect, process, use and retain personal data for the reason it was provided to Revlon, unless we have another lawful basis for other uses, and as necessary for the Company’s recordkeeping purposes
- Keep personal information accurate, complete, and up-to-date
- Take reasonable steps to safeguard personal data to prevent unauthorized access, disclosure, or use
- Comply with all applicable data privacy laws

Revlon People should also practice good **cybersecurity hygiene**, as we all play a critical role in helping to prevent, detect and respond quickly to cyber threats. If you suspect any loss, theft, or unauthorized access, use or disclosure of personal or sensitive information, please contact Revlon Compliance, IT Security or Revlon Legal immediately.

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We Keep Company Communications Professional

Revlon People should exercise professionalism in all communications and consider the purpose and context when creating documents or communicating on behalf of the Company. All documents and communications created by Revlon People in connection with Revlon’s business – whether they reside on the Revlon network or elsewhere – are considered corporate records that may be subject to production and review under applicable laws. All written or recorded communications should be professional, as concise and clear as possible, and avoid sarcasm or other language that could be misinterpreted when taken out of context.

We Protect Privacy of Communications

Revlon People are required to comply with all laws governing wiretapping and other forms of electronic surveillance as well as the use of these recordings. Generally, employees are prohibited from making any sound, photographic or video recordings, and using or disclosing such recordings in any manner (e.g., social media, electronic messages, e-mail, facsimile, or regular mail).

Recording an internal training session for Revlon People to make it available to team members who could not attend is permissible, as long as all participants consent before the recording begins. Such recordings are owned by Revlon and must not be shared externally. In addition, these recordings must be maintained according to Revlon’s **Global Records Retention Policy**.



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We Use Social Media Responsibly

Revlon People are expected to use good judgment and common sense when using social media professionally and personally. Revlon People are required to use social media in a manner that is consistent with our Company's values and complies with all applicable laws.

If you use social media in connection with your role at Revlon, you are required to follow the Company's **Social Media Policy**. The Social Media Policy also provides guidance on the personal use of social media referencing Revlon.

The following behavior is prohibited, particularly when using social media and other online postings:

- Disclosing confidential, proprietary and/or sensitive information owned by the Company or any of its employees, subsidiaries, or affiliates
- Disparaging the Company, its employees, its products, or any of its competitors
- Posting inappropriate pictures, documents, emails, electronic messages or any recordings from the workplace or of Revlon People
- Unauthorized sale of Company products
- Engaging in any behavior that is unprofessional, unethical, disrespectful, illegal, or violates this Code and/or applicable law

We Follow Company Procedures when Responding to Inquiries from the Press and Others

To ensure that our communication with external parties is accurate and consistent with applicable laws, we limit the individuals who may communicate with the press, news media, investors, analysts, governmental bodies, and others as follows:

- Requests from the media, including requests for quotes, interviews of any Revlon People, press releases, financial or business information, etc., must be immediately referred to the CEO's Chief of Staff
- Requests from any government or regulatory body (U.S. or non- U.S.), including subpoenas and requests for information, must be immediately referred to Revlon Legal and/or Revlon Compliance before any action is taken

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We Protect Consumers through Product Compliance and Quality Assurance

Quality is the hallmark of our products. Revlon People are required to comply with all applicable laws governing the manufacture, labeling and distribution of our products as well as the Company's quality standards, control and assurance procedures and safety protocols.

The requirements of the U.S. federal Food and Drug Administration (the "FDA") must be observed, as well as those of various other federal, state, local and foreign regulatory authorities, including those in the European Union ("EU"), Canada and other countries in which we operate.

Revlon People must immediately report to their supervisor, Revlon Legal and/or Revlon Compliance if they become aware of any deviations from the Company's established quality and safety standards and procedures, whether intentional or accidental, or of any circumstances in which any of the Company's products are or become adulterated or misbranded or otherwise violate or potentially violate FDA, EU or other product safety or quality regulations in the territories in which our products are sold.

We Comply with Advertising Laws and Regulations

Fair and accurate advertising is essential to preserve the Company's goodwill and reputation. Revlon People are prohibited from creating, approving, or disseminating false, misleading, or deceptive advertising and related activities in the promotion and sale of Company products. All advertising claims about our products (including those claims made in print, radio, TV, digital or which appear on product packaging) must be truthful and have a reasonable basis in fact. In the U.S., the Federal Trade Commission requires that all advertising claims be substantiated in advance of their publication, dissemination, or air date, which includes any advertisements on television networks in the U.S. and abroad.

Therefore, all advertising and product claims, whether made to the trade or to the public, or whether made through the media, over the Internet or on product packaging, displays or otherwise, must be reviewed and approved by Revlon Legal, in accordance with Company policies, prior to being disseminated.

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We Provide Truthful Information and Engage in Fair Dealing

Revlon People are expected to act with integrity and deal fairly with each other and the Company's existing and potential customers, consumers, suppliers, and competitors.

Engaging in schemes to defraud the Company or cheat a customer, consumer, supplier, or others with whom the Company does business out of money, property, or services or to wrongfully withhold or misappropriate the property of others violates applicable law and Company policy and is therefore prohibited.

Revlon People should speak truthfully and make accurate, non-misleading statements. It is a violation of this Code to knowingly and willfully make false statements orally or in writing or conceal a material fact in connection with:

- An official Company action, including statements related to employment, services for the Company, employee benefits, statements made in connection with investigations and required employee reports
- Any interaction with any federal, state, local or foreign government officials, regulators, or agencies, including governmental reports, applications, or other government filings



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Alison Hinds-Pearl

Chief Compliance Officer & Assistant General Counsel
alison.hinds-pearl@revlon.com



Chelsea P. Azrak

Vice President, Law & Deputy Compliance Officer
chelsea.azrak@revlon.com

Embracing Revlon's values and acting with integrity fosters a culture of trust, which is the foundation of everything we do. We are *One Team with One Vision* and one united goal to protect Revlon and each other. Making the right business decisions may not always be easy. Revlon Compliance is here to help whenever you have questions or concerns and our Compliance page on [oneinbeauty.com](https://www.oneinbeauty.com) has many helpful resources. **We encourage you to reach out and Speak Up.**

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